

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,

Debtor.

Case No. 20-12345 (MG)

Chapter 11

**LONDON MARKET INSURERS' LIMITED JOINDER TO THE DEBTOR'S OMNIBUS
REPLY IN SUPPORT OF DEBTOR'S MOTION (A) FOR AN ORDER (I) APPROVING
DISCLOSURE STATEMENT, (II) APPROVING FORM AND MANNER OF SERVICE
OF DISCLOSURE STATEMENT NOTICE, (III) ESTABLISHING PROCEDURES FOR
SOLICITATION AND TABULATION OF VOTES TO ACCEPT OR REJECT PLAN OF
REORGANIZATION, (IV) APPROVING RELATED NOTICE PROCEDURES, AND (V)
SCHEDULING HEARING ON CONFIRMATION OF PLAN OF REORGANIZATION**

Certain Underwriters at Lloyd's, London subscribing various policies, Ancon Insurance Co. (UK) Ltd., Assicurazioni Generali T.S., Dominion Insurance Co. Ltd., Excess Insurance Co. Ltd., London & Edinburgh General Insurance Co. Ltd., St. Katherine Insurance Co. Ltd., Terra Nova Insurance Co. Ltd., Turegum Insurance Co. Ltd., Unionamerica Insurance Co. Ltd., and Yasuda Fire & Marine (UK) Ltd. (collectively, "London Market Insurers" or "LMI"), by and through their undersigned counsel, hereby join, on a limited basis, certain arguments set forth by the Roman Catholic Diocese of Rockville Centre, New York ("Debtor") in the *Debtor's Omnibus Reply in Support of Debtor's Motion (A) for an Order (I) Approving Disclosure Statement, (II) Approving Form and Manner of Service of Disclosure Statement Notice, (III) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Reorganization, (IV) Approving Related Notice Procedures, and (V) Scheduling Hearing on Confirmation of Plan of Reorganization* (Dkt. No. 3326) ("Reply") and respectfully state as follows:

LMI join in the Debtor's arguments, relating to the Settling Insurer Supplemental Injunction and the section 363 sale, as set forth in the Reply that responds to the *Omnibus Objection of the United States Trustee to Motion of the Debtor for Entry of Order (I) Approving Disclosure*

Statement, (II) Approving Form and Manner of Service of Disclosure Statement Notice, (III) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Reorganization, (IV) Approving Related Notice Procedures, and (V) Scheduling Hearing on Confirmation of Plan of Reorganization (Doc. 3323) (“UST Objection”).

For the reasons set forth in the Reply, LMI respectfully request that the Court overrule the UST Objection, as it relates to the Settling Insurer Supplemental Injunction and the section 363 sale.

Dated: October 25, 2024

Respectfully submitted,

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